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Attorneys for Defendants

10 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

11
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 BRENNA SCHRADER, an individual, on
15 behalf of herself and all others similarly
situated,

16 Plaintiff,

17 vs.

18 STEPHEN ALAN WYNN; an individual;
19 MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
20 a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
21 Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

22 Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR ALL DEFENDANTS
TO FILE THEIR REPLIES TO:**

**(1) PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT WYNN
LAS VEGAS, LLC'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT,
DEFENDANT STEPHEN ALAN
WYNN'S MOTION TO DISMISS, AND
DEFENDANT MAURICE WOODEN'S
MOTION FOR A MORE DEFINITE
STATEMENT (ECF NO. 54); AND**

**(2) PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT WYNN
RESORTS, LTD.'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT
(ECF NO. 55)**

(THIRD REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader (“Plaintiff”), through her counsel Richard Harris Law Firm, and Defendants Wynn Las Vegas, LLC (“WLV”) and Wynn Resorts, Ltd. (“WRL”), through their counsel Jackson Lewis P.C., Defendant Stephen Alan Wynn (“Mr. Wynn”), through his counsel Peterson Baker, PLLC, and Defendant Maurice Wooden (“Mr. Wooden”), by and through his counsel Kennedy & Couvillier, that all Defendants shall have a 14-day extension up to and including June 19, 2020, in which to file replies to Plaintiffs’ Response in Opposition to Defendant Wynn Las Vegas, LLC’s Motion to Dismiss Plaintiff’s Complaint, Defendant Stephen Alan Wynn’s Motion to Dismiss, and Defendant Maurice Wooden’s Motion for a More Definite Statement (ECF No. 54); and Plaintiff’s Response in Opposition to Defendant Wynn Resorts, Ltd.’s Motion to Dismiss Plaintiff’s Complaint (ECF No. 55).

This Stipulation is submitted and based upon the following:

1. On March 6, 2020, Defendant WLV filed a Motion to Dismiss (ECF No. 35) to which Defendant WRL filed a Joinder (ECF No. 37); Defendant WRL filed a Motion to Dismiss (ECF No. 36); Mr. Wynn filed a Motion to Dismiss (ECF No. 39); and Mr. Wooden filed a Motion for a More Definite Statement (ECF No. 33).

2. On April 28, 2020, the parties stipulated that Plaintiff would file her response to Defendants’ Motions by May 8, 2020, and Defendants would file their replies by May 22, 2020. ECF No. 50. The Court granted the stipulation on April 29, 2020. ECF No. 51.

3. On May 18, 2020, the parties stipulated to allow Defendants to file their replies by June 5, 2020. ECF No. 58. The Court granted the stipulation on May 22, 2020. ECF No. 59.

4. Since the parties’ last stipulation, Defendants determined they need additional time to prepare their replies. In particular, Defendants WRL and WLV are actively engaged in preparations to resume business operations, with WLV anticipating reopening the Wynn Las Vegas and Encore Las Vegas hotel and casino properties to the public on June 4, 2020. Further, the undersigned counsel for WRL and WLV are preparing for and involved in two arbitration hearings taking place over the next few weeks which at the time of the parties’ prior stipulation did not appear likely to proceed due to the ongoing COVID-19 pandemic. Collectively, these events are impeding counsel’s ability to complete the replies by the current deadline. As such, the parties

respectfully request the Court grant this instant Stipulation and allow all Defendants an additional 14 days up to and including June 19, 2020 to file their replies to Plaintiff's responses.

5. This is third request for an extension of time for Defendants to file their replies to Plaintiff's responses.

6. This request is made in good faith and not for the purpose of delay.

7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 3rd day of June, 2020.

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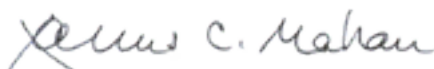
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ORDER

IT IS SO ORDERED:



United States District Court Judge

Dated: June 3, 2020
